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*Attorney for Petitioner Joseph Perez

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA
14

15 Joseph Perez,

16 Petitioner,

17 v.

18 The Attorney General of the State of
19 Nevada; N.D.O.C., *et al.*,

20 Respondents.
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Case No. 2:18-cv-02077-KJD-VCF

Unopposed motion to seal exhibit

1 Petitioner Joseph Perez respectfully requests that the Court order the Clerk to
2 seal a confidential medical record located on the docket at ECF No. 25-1. While courts
3 prefer the public retain access to judicial filings and documents, *see Nixon v. Warner*
4 *Commc'ns Inc.*, 435 U.S. 589, 597 (1978), a party may request sealing of a judicial
5 record by demonstrating “compelling reasons” to prevent public access, *see*
6 *Kamakana v. City and Cty. of Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006).

7 Here, Mr. Perez has “compelling reasons” to request sealing this document.
8 The exhibit located at ECF No. 25-1 contains detailed personal and medical
9 information related to Mr. Perez’s mental health diagnoses. It is generally
10 appropriate for courts to seal documents containing this type of medical information.
11 *See, e.g., Williams v. Nevada Dep’t of Corr.*, No. 2:13-cv-00941-JAD-VCF, 2014 WL
12 3734287, at *1 (D. Nev. July 29, 2014) (stating “the need to protect medical privacy
13 has qualified as a ‘compelling reason[]’ for sealing records,” and collecting cases). Mr.
14 Perez therefore requests the Court issue an order directing the Clerk to seal ECF No.
15 25-1.

1 On March 31, 2022, counsel contacted Deputy Attorney General Katrina
2 Samuels and informed her of this request. Attorney Samuelson had no objection to
3 the request.

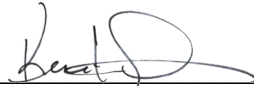
4 Dated April 4, 2022.

5 Respectfully submitted,

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7 Rene L. Valladares
8 Federal Public Defender

9 /s/Rick A. Mula
10 Rick A. Mula
11 Assistant Federal Public Defender

12 IT IS SO ORDERED:

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15 United States District Judge

16 Dated: 4/7/2022
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